FEMP ACCESS REQUEST

(Note: Picture ID required)

FAX NUMBERS: Visitors - 648-5606 Permanent - 648-5599

TO BE COMPLETED BY REQUESTOR								BE COMPLE SECURITY	
NON-US CITIZENNON-US CITIZ (CONTACT SECU		EXEMPTION: (3) S AREA TO BE VISITED	ONTRACTORTEMP	`				TBADGE NUMBER ISS	
PERSONAL							DATE C	OF BIRTH:	SEX: MALE FEMALE
INFORMATION	PREFERRED	FIRST NAME: (FOR PER	RMANENT BADGE)				SOCIAL SE	CURITY NUMBER:	
(5)	PERMANENT STREET:	T HOME ADDRESS:	CIT	TY:	STAT	E:	l	ZIP CODE:	
EMPLOYER INFORMATION	COMPANY NAI	ME:					COM (PANY TELEPHONE NC):
INFORMATION (6)	COMPANY ADI	DRESS:							
	STREET:		CIT	ΓY:	STATE	COMPANY HOM	IE OFFICE CON	ZIP CODE:	
	JOB CODE: (See back for C	JOB TITLE: (7) onstruction Contractors)						(8)	
DATE(S) ACCESS REQUIRED:	START DATE	≣: <u>/</u> /	END DATE: _(9) /		(Maximum 1 Year)	•		MIT BADGE	ONLY
ON SITE CONTACT/S	SUPERVISOR	(PRINTED): (11)			TELEPHONE N	O: (12)			
SIGNATURE OF AUT (Construction Contrac	HORIZER (FO	R VISITORS) OR TECH. Fact and Authorizer)	REP. (FOR SUBS. & TEAMING	PARTNERS): (13)				BADGE NO:	(14)
			MEDI	ICAL REQUIREMENTS					
PHYSICAL EXAM RE BASELINE PHY			DRKER (15) A	ASBESTOS WORKER		RESPIRA	TOR WEARE	ER	
				G REQUIREME	ENTS				
GENERAL EMPI SITE WORKER RADIOLOGICAL RADIOLOGICAL	N RULES & REGI LOYEE TRAINING TRAINING (SWT) . WORKER I (RAI . WORKER II (RAI NE IN VIVO REQI	G (GET) O I) D II*)	ASBESTOS ABAT	FEMENT WORKER FEMENT PRACTICES CTOR/SUPERVISOR)		CON LEA OSH	ITROL (LOCK & D WORKER IA OUTREACH :FR 1926.65 SU	RGY & MATERIAL & TAG) (30HR /10 HR JPERVISOR TRAINING	i.) -
				METRY REQUIREMENTS					
TOUR ESTIMATED WHO	ILE RODY DOSE	RECEIVED AT NON-FERNALD (mrem) THIS (CALENDAR QUARTER (mrem) THIS CALENI	'				
BIOASSAY:	SAMPLE	NUMBER	DATE:BASELINE INTHORIUM		WAYEN THE EESTAL	NONTH?	DIO PHARMACI NO	EUTICALS	
RADIOLOGICAL ESCORT		YESNO		JAINIT EL		DATE:	BADG	GE:	TELEPHONE NO:
ESCORT SIGNATURE: _		PRINTED Escort is	responsible for ensuring that the v	visitor has completed train	ing requirements conta	nined in SE-001			
SIGNATURE OF TLD REG	CIPIENT:					DATE:	REVI	EWED BY: (INITIALS)	DATE:
			DO NOT WRITE BELOW TH	HIS LINE - TO BE COMPLE	TED BY DOSIMETRY		•		
EMPLOYMENT STAT	ΓUS:(/	A) MONITORED WORKER	(B) NON-EMPLOYEE RA	DIATION WORKER	© MONITORED VISI	TOR			
DOE OCCUPATION COD	E: CC	NTRACT CODE:	TLD NUMBER:	ISSUE DATE:	RETURN D	ATE:	PERMANENT LOCATION	BADGE REQUESTED?	<u> </u>
LD RESULTS:	SKIN	WHOLE I	BODY RADI.	ATION TYPE	1		SECURITY BA	ADGE NO:	_
	US Code authorize tion may be: To D oceedings. Failure		THIS DOCUMENT CONTAINS The primary use of this information is of their contracts; to the DOE, Depa sested information may result in your	INFORMATION COVERED is to allow for accurate recon rtment of Health, and Humal not being issued a personal	D BY THE PRIVACY ACT ding and tracking of your n services, Department o radiation monitoring dev	radiation exposure f Labor and other o ice and subsequen	at the Fernald s rganizations for tly being denied	site and other nuclear fac epidemiological studies; access to the radiologic	cilities. Additional and to legal al area(s).

	CONSTRUCTION CONTRACTORS											
JOB CODES FOR <u>CONSTRUCTION</u> CONTRACTORS												
Che	Check the Appropriate Position: CONSTRUCTION CRAFT, INCLUDING FOREMEN Check the Appropriate Position: CONSTRUCTION CONTRACTOR STAFF Check the Appropriate Position:											
	Craft	Code	Safety Sensitive Position?		Staff	Code	Safety Sensitive Position?					
	Asbestos/Instructor Worker	C N01	YES		Administrative	GC08	NO					
	Boilermaker	CN02	YES		Office Engineer	EP01	NO					
	Bricklayer	CN03	YES		Construction Engineer	OP12	YES					
	Carpenter	CN0006	YES		Construction Superintendent	OP12	YES					
	Cement Mason	CN04	YES		Cost/Scheduler/Estimator	AN01	NO					
	Electrician	CN0022	YES		Engineering Aid/Technician	NE04	NO					
	Floor Layer	CN05	YES		Project/Construction Manager	EP05	NO					
	Glazer	CN06	YES		Health and Safety Representative	TA04	NO					
	Ironworker (Rebar)	CN07	YES		Quality Representative	EO05	YES					
	Ironworker (Structural)	CN07	YES									
	Lather	CN08	YES									
	Laborer (Construction)	CN38	YES									
	Millwright	CN0050	YES									
	Operating Engineer (Operator)	CN09	YES									
	Painter	CN0054	YES									
	Pile Driver (Driller)	CN10	YES									
	Pipefitter	CN0055	YES									
	Plumber	CN11	YES									
	Plasterer	CN12	YES									
	Roofer	CN13	YES									
	Sheetmetal Worker	CN14	YES									
	Sprinkler Fitter	CN15	YES									
	Tile Finisher	CN16	YES									
	Tile Layer	CN17	YES									
			NON-CONSTRUCTION	JOB C	DDES							
	tain Non-Construction Job Codes, please view Fluor Daniel Fernald Hu uestions concerning job codes, please contact Medical at 648-4442 or 6		ob codes (listing in IPEx), or h	ard cop	y can be obtained by contacting Security at 648-3667.							
			SAFETY SENSITIVE POSI	TION C	HECKLIST							
WILL	THE INDIVIDUAL:											
1.	Yes No Have unescorted access to the controlled area of	f the FEMP?										
2.	Be working at unprotected heights (for example la	adders and scaffo	olds)?									
3.	Be working with or operating of hazardous movin	g machinery or e	quipment?									
4.	Be operating a motor vehicle (forklifts, cars, or true	ucks)?										
5.	Be working with a hazardous substance that could	ld cause significa	nt injury or illness?									
If you	answered "yes" to any of these questions the applicant is required to re	ceive a confirmed	d negative drug test result prio	r to bad	dge issuance and reporting to work.							
Pleas	e schedule testing at least three working days prior to expected work day	te. To schedule	drug testing, contact Medical	Service	s (513) 648-4433.							

FS-F-3207 (REV. 06/13/96) 2 Of 3

INSTRUCTIONS FOR COMPLETING FEMP ACCESS REQUEST FORM FOR CONSTRUCTION CONTRACTORS

Refer to form for corresponding information numbers in parenthesis.

- 1) If the person requiring access to the FEMP is a US Citizen put an "X" next to "US Citizen". If not, put an "X" next to "Non-US Citizen" and call 648-5602 to obtain information about special requirements for access by non US Citizens. Also, indicate the country of citizenship.
- 2) Access type Either put an "X" next to "Construction Visitor" or "Construction Contractor" as appropriate.

A Construction Visitor can be a Contractor manager, technical representative, or other personnel who will not be performing any hands on work. The visitor shall be escorted and trained as required for visitors by the health & safety requirements provided in the Contract.

A "Construction Contractor" is an employee of the Contractor or Subcontractor who will be performing work on site.

- 3) Exemption Do not mark. This is not applicable to Construction Contractors.
- 4) Safety Sensitive Position Look on the back side of the form under "Construction Contractors" and find the craft or staff position and transfer the "YES" or "NO" under "Safety Sensitive Position" to the front of the form.
- 5) Personal Information Complete the information for the person requiring access.
- 6) Employer Information Complete the information for the employer of the person requiring access. If this is a Subcontractor, the lower-tier information should be used.
- 7) Job Code and Title look on the back side of the form and transfer the craft or staff title and corresponding code, for the person requiring access, to the front. Any questions regarding job codes should be referred to Medical (648-4442).
- 8) Company Home Office Contact Put the name of the "employers" home office contact who is responsible for this Contract and who can take action to contact employees if required.
- 9) Start and End Dates Enter the necessary beginning and ending dates for site access (Maximum 1 year). Visitors may also be accessed up to one year to cover multiple visits.
- 10) MIT Badge This badge is issued for training, Medical and Invivo purposes only. Enter the date the person requiring access will arrive at the site access point and a date that is two weeks from the access date.
- On Site Contact Enter the name of the person who will be responsible for the person requiring access and can contact that person when they are on-site. Typically this will be the Contractor or Subcontractor's supervision.
- 12) Enter the telephone number of the on site contact.
- 13) Signature of Authorizer The authorizer is the Contractor or Subcontractor manager or supervisor whose name has been provided to the Fluor Daniel Fernald Contract Administrator and is authorized by the Contractor to sign this form.
- 14) Badge Number of the Authorizer.
- 15/16) Medical and Training Requirements put an "X" next to the medical and training requirements that are applicable to the person requiring access. The Health & Safety Requirements Matrix from Part 8 of the Contract should be used to determine the requirements.
- 17) All parts of the form below "Dosimetry Requirements" will be completed after the person arrives on site.

GENERAL

The person requiring access should be told to bring a picture ID and an estimate of their Rad dose received other than at Fernald (if any).

If the person has prior training from other DOE sites, Greater Cincinnati Building and Contractor Trades training, or training by other authorized trainers, copies of certificates of this training should also be brought.

Give, or fax (648-5599), this form to the Construction Training Coordinator in Access Administrator at least 24 hours in advance of required access.

A non-US Citizen, working 30 days or more in a calendar year, requires six weeks processing time.

EXHIBIT "2" CONTRACT TRAINING AND MEDICAL SCHEDULE LOCATIONS

TRAINING REQUIREMENT	DURATIO N HOURS	FREQUENCY	PROVIDED BY	TIME PROVIDED	LOÇATION PROVIDED
CONST. RULES/REG.	2	one time	Fluor Daniel Fernald	Mon Thur. 8:00 a.m.	FEMP
GENERAL EMPLOYEE TRAINING (GET) or GET/CBT	6	one time	Fluor Daniel Fernald	GET - Mon. 11:30 a.m. GET/CBT -schedule	Site Training Center and FEMP
COMPUTER BASED TRAINING GET REFRESHER WITH SUPPLEMENT (CBT) (SEE REQUIRED ADDITIONAL ANNUAL TRAINING TABLE)	5	annually	Fluor Daniel Fernald	Mon Fri. Schedule	
SITE WORKER TRAINING	12	one time	Fluor Daniel Fernald	TueWed. starting 7:00 a.m. *every other week*	Site Training Center
RADIOLOGIÇAL WORKER I CBT	8	one time	Fluor Daniel Fernald	Schedule Mon. thru Fri. 7:00 a.m.	Site Training Center
RAĐIOLOGICAL WORKER I RETRAINING CBT	6	every two years	Fluor Daniel Fernald	Schedule Mon Fri.	Site Training Center and FEMP
RAÐIOLOGIÇAL WORKER I RETRAINING PRACTIÇAL	1	every two years	Fluor Daniel Fernald	Schedule time Wed. only	Beta Building
RAÐIOLOGIÇAL WORKER II RAÐ ID or RAÐ II CBT	20	one time	Fluor Daniel Fernald	Schedule Thur Mon. starting 7:00 a.m.	Alpha Building
RAĐIOLOGIÇAL WORKER II RETRAINÎNG CBT	6	every two years	Fluor Daniel Fernald	Schedule Mon Fri.	Site Training Center and FEMP
RAĐIOLOGIÇAL WORKER II RETRAINING PRACTIÇAL	2	every two years	Fluor Daniel Fernald	Schedule time Wed. only	Beta Building
RESPIRATOR CBT NOTHER RAD WORKER II	4	annually	Fluor Daniel Fernald	Schedule Mon Fri.	Site Training Center and FEMP
RESPIRATOR FIT TESTING	1	annually for non- asbestos workers, every six months for asbestos, lead, and cadmium workers	Huor Daniel Fernald	Schedule	FEMP
РHYSICALS	3	annually for Radiological Worker II	Fluor Daniel Fernald	Schedule	<i></i> FEMP
IN-VIVO MONITORING NOTE: Only for Radiological Worker II	1	required prior to start work, annually, and exit	Fluor Daniel Fernald	Schedule	FEMP
IN-VITRO NOTE: Only for Radiological Worker II	1	Submit sample to FD F Medical Every 6 days	Fluor Daniel Fernald	ANY	Fluor Daniel Fernald Medical
OSHA CONSTRUCTION OUTREACH	30	acquire 60 days after Notice to Proceed	Fluor Daniel Fernald	Schedule	Alpha Building
29 CFR 1926.65 SUPERVISED FIELD EXPERIENCE ONE DAY (FOR RAD 1)	8	one time	Sub.	Start after successful completion of initial training	conduct on the job site at the FEMP

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EXHIBIT "2" CONTRACT TRAINING AND MEDICAL SCHEDULE LOCATIONS

TRAINÌNG REQUIREMENT	DURATIO N HOURS	FREQUENCY	PROVIDED BY	TIME PROVIDED	LOCATION PROVIDED
29 CFR 1926.65 SUPERVISED FIELD EXPERIENCE THREE DAY FOR RAD III	24	one time	Sub.	Start after successful completion of initial training	conduct on the job site at the FEMP
ASBESTOS O & M NOTE: Class III Worker not Removal	4	annually	Fluor Daniel Fernald or Sub.	Schedule	FEMP
ASBESTOS CLASS IV	2	annually	Fluor Daniel Fernald or Sub.	Schedule	<i>F</i> EMP
ASBESTOS,ABATEMENT WORKER NOTE: For Removal	32	one time	Sub.	Schedule	
ASBESTOS ABATEMENT WORKER REFRESHER	8	annually	Sub.	Schedule	
ASBESTOS ABATEMENT PRACTICES-CONTRACTOR/ SÜPERVISOR	40	one time	Sub.	Schedule	
ASBESTOS ABATEMENT PRACT ICES- CONTRACTOR/SUPERVISOR REFRESHER	8	annually	Sub.	Schedule	
ASBESTOS ABATEMENT PRACTICES-OTHER AS REQUIRED BY THE CONTRACT	varies		Sub.		
ENERGY CONTROL (LOCK AND TAG)	8	one time	Fluor Daniel Fernald	Schedule	Alpha Building
ENERGY CONTROL (LOCK AND TAG) Refresher	4	annually	Fluor Daniel Fernald	Schedule	Alpha Building
K-65 SLO/RTS_ACCESS	3	one time	Fluor Daniel Fernald	Schedule	FEMP
CONFINED SIACE	8	one time	Fluor Daniel Fernald	Schedule	Beta Building
NVO 325 INITĮAL	8	one time	Fluor Daniel Fernald	Schedule	<i></i> FEMP
NVO 325 REFRESHER	2	annually	Fluor Daniel Fernald	Schedule	FEMP
LEAD WORKER TRAINING	8	annually	Fluor Daniel Fernald	Schedule	FEMP

REQUIRED.ADDITIONAL.ANNUAL.TRAINING

In addition to GET Refresher with supplement annual training each employee must complete 3 hours of training from the following list.

Documented attendance for Pre-Work Safety Meeting (Part &A 9.1)

Documented attendance weekly tool box safety meetings (Part 8A 9.2)

Cumulated and documented time from daily briefings (Part $\mbox{\it \$A}$ 9.3)

2 of 2 07/08/96

EXHIBIT "2"

CONTRACT TRAINING AND MEDICAL SCHEDULE LOCATIONS

Respirator Training (4 hours)

Lock and Tag Training (8 hours)

Confined Space Training (8 hours)

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ENTERING AND EXITING THE ASBESTOS DECONTAMINATION FACILITY

Because of the radiological nature of the FEMP site, it is necessary to take into account radiological requirements when entering and exiting an asbestos work area which is located within a radiological area. The following protocols have been developed and shall be used by the asbestos removal Contractor to exit asbestos work areas within radiological areas:

1.0 Decontamination for Asbestos Work Performed in Radiological Contamination Areas

The following decontamination procedure shall be used to exit asbestos work areas within radiological areas until completion of a negative exposure assessment for asbestos:

When exiting a designated asbestos work area, workers will HEPA vacuum any gross contamination from their respirator and protective clothing in the equipment area, and then proceed to the radiological (contamination) control point.

If workers are required to wear two layers of protective clothing for radiological contamination control, workers will remove their outer gloves, coveralls, rubber shoe covers and disposable shoe covers in the equipment area (adjacent to the asbestos work area), place them in a labeled container for disposal or cleaning and then proceed to the radiological control point.

At the radiological control point, workers will remove their outer gloves and rubber shoe covers and place them into labeled containers for disposal or cleaning.

Workers will remove their hood, remove their respirator and then remove the cartridges from their respirator. The hood and respirator cartridges shall be placed into containers for disposal and the respirator placed into a respirator recycling receptacle.

Workers shall continue removing their protective clothing, shoe covers and inner gloves and dispose of in labeled containers for disposal or cleaning.

The worker will step into a personal contamination monitor to ensure that they have not been radiologically contaminated.

If no radiological contamination is detected, the worker may exit the radiological contamination area.

If radiological contamination is detected, radiological control technicians will take measures to remove the contamination from the worker's skin, prior to the worker exiting the radiological contamination area.

Date

SWU EXCAVATION OSDF PHASE II ASBESTOS DAILY JOB SITE INSPECTION

Work Location:			
Type of Work:			
	I		
REQUIRED FOR ALL CLASSES OF ASBESTOS WORK	NOT APPLICABL E	YES	NO
Work site barriers established: Tape/rope completely around work area			
Entry/exit to work area is controlled preventing unauthorized access			
Air monitoring in progress, air samples are worn properly			
Personal protective equipment/respirators properly worn			
HEPA vacuums available/used for clean-up/decontamination			
Wetting agents available/being used at the job site			
Work being performed using wet methods			
No asbestos dust/debris is visible			
Waste/debris immediately placed into waste bags			
Workers following appropriate hygiene procedures			
Comments or corrective action(s) taken for any deficiency identified above is(are) listed on the back of thi	is form.		

Competent Person's Signature

^{*}APPLIES TO HANDLING OF FRIABLE PACM

ASBESTOS DAILY JOB SITE INSPECTION

С	0	r	r	е	С	t	i	V	е
Actions/N	Notes:								
	-								

S-F-4151 (05/05/95)

RESPIRATOR REUSE CRITERIA

1.0 SCOPE:

The following procedures will outline the necessary steps that must be followed to properly sanitize and survey respirators (facepiece and cartridges together) so that they may be safely reused. The steps in this procedure, and all release criteria, are for work performed in uranium contamination areas only.

2.0 DEFINITIONS and LIMITS:

<u>Buffer Zone Respirator Storage Area</u>-Located on the buffer table, these are the shelves where empty respirator bags are placed by workers before entering the contamination area, and where sanitized and bagged respirators are placed when coming out on break. FDF RCT's remove the respirators from these shelves and perform surveys on the respirators.

<u>Clean Side Respirator Area</u>-This shelving unit is similar to the Buffer Zone Storage Area, but only sanitized respirators that pass a radiological survey are placed here.

NOTE: All of the above-mentioned areas will be demarcated with signs or labels.

Respirator-The term respirator will refer to the combination of cartridges and facepiece as a whole.

Release Limits for Uranium Contamination:

RESPIRATOR REUSE

For reuse of respirators from a uranium contamination area; direct frisk contamination surveys, using a beta-gamma monitoring instrument (frisker), must indicate levels less than 100 cpm above background and removable contamination surveys, measured by field counting smears using a beta-gamma monitoring instrument (frisker), must indicate less than 100 cpm above background.

Other Restrictions to Reuse

Respirators shall only be used by the same worker for any one shift.

For asbestos and lead jobs, this procedure only applies if a negative exposure assessment has been completed.

This procedure does not apply to cartridges other than particulate cartridges (HEPA cartridges with magenta color or banding). Approval by the FDF Respiratory Protection Program Administrator shall be required for reuse of cartridges other than particulate cartridges per terms of this procedure.

The wearer shall have the right to refuse reuse of a respirator or cartridge if the wearer feels that the steps outlined in this procedure do not produce an adequately clean, sanitary and in good operating condition respirator. In addition, the wearer shall have the right to refuse reuse of a cartridge if the wearer feels that the breathing resistance of that cartridge is too high.

This procedure does not apply to workers performing work in thorium regulated areas.

2.0 TECHNICAL APPROACH:

2.1 Doffing and Frisking Respirator

Reuse Respirator
Criteria

EXHIBIT "5"

- a. Write name, badge number and date on the original respirator bag. Place this bag in the buffer zone respirator storage unit prior to entering the contamination area.
- b. When coming out of the area on break, remove hood and outer gloves.
- c. Frisk inner gloves with a portable beta-gamma frisker. If contamination is indicated (>100 cpm above background), a new set of gloves must be donned over the original gloves before continuing.
- d. While looking in a mirror, wipe off the exterior of the facepiece and cartridges with a wet wipe designed to clean/sanitize respiratory protection equipment.
- e. While looking in a mirror, perform a frisk of all exposed surfaces of the respirator and cartridges with a portable beta-gamma frisker.
- 1. If contamination levels are greater than or equal to 100 cpm above background, remove the respirator, dispose of cartridges and place facepiece in the respirator drum.
- 2. If the contamination levels are less than 100 cpm above background on the respirator and cartridges, continue to step 3.1.f.
- f. Doff the respirator. Place the respirator with cartridges still in place, on the appropriate bag on the buffer table or shelving unit.
- g. Continue to doff remaining anti-C's.

2.2 Sanitizing the Respirator

- a. After removing all ant-C's step across the step-off pad and frisk hands at the buffer table. If hands are clean continue to the next step, if the contamination level is greater than or equal to 100 cpm above background, contact a FDF Radiological Control Technician.
- b. Don a new pair of latex gloves. Use paper towels to dry the respirator if necessary and use a wet wipe designed to clean/sanitize respiratory protection equipment to sanitize the respirator.
- c. Put the sanitized respirator into the bag with your name on it and use a twist tie or tape to close the bag.
- d. Place the bagged respirator on the buffer zone table (or Buffer Zone Respirator Storage Area), dispose of all wet wipes, paper towels, and latex gloves as rad waste, and then monitor out of the area using the PCM-1B as usual.

NOTE: Do not stack respirators on top of each other. If any doubt exists about who a certain respirator facepiece was used by, that respirator facepiece will not be re-used. Discard the cartridges and place the facepiece in the respirator drum.

EXHIBIT "5"

2.3 Surveying Sanitized Respirators-

a. A FDF Radiological Control Technician will don clean latex gloves and get a bagged respirator from the Buffer Zone Storage Area. Remove the respirator from the bag and perform a smear of the entire respirator, including the cartridges, beginning with interior surfaces and then proceeding to the exterior surfaces. Survey the smear using a portable beta-gamma frisker.

NOTE: Oil treated cloth (i.e. masslin cloth or equivalent) shall not be used to smear the respirator. The residual oil left on the respirator may cause deterioration of the respirator parts.

- b. Perform a direct frisk for fixed contamination of all accessible surfaces of the respirator using a portable beta-gamma frisker.
- c. Based on the survey results, perform the following:
 - 1. If fixed or loose contamination levels are greater than or equal to 100 cpm above background, remove the cartridges and place the facepiece in the respirator drum.
 - 2. If fixed or loose contamination levels are less than 100 cpm above background on the respirator and cartridges, place the respirator back in the bag and put in the designated clean side storage location.

2.4 Reusable Respirator Donning Sequence

- a. Don all anti-C's except outer gloves and hood, proceed to the Clean Side Respirator Storage Area, and get the re-usable respirator with your name on it.
- b. Perform pre-donning inspection, don respirator, and perform positive and negative pressure tests.
- c. Don outer gloves and hood for re-entry into the area.

FERNALD SITE OPERATOR VERIFICATION

(HOISTING AND RIGGING)

In compliance with the Department of Energy (DOE) Hoisting and rigging Manual (Rev 04/93) or successor document.

I verify that	of Local . who is being referred to a Contractor at
the Fernald Environmental Management Pro	of Local, who is being referred to a Contractor at ject (FEMP), has successfully completed a year Building
Trades Apprenticeship Program, registered an	d approved by the United States Department of Labor (DOL), and
	n included dedicated instruction in:
oCrane Types	oCapacities
oComponents/Systems	oRadius Between Values
oTerminology	oBoom Length Between Values
oCenter of Gravity	oBoom Angle Between Values
oOperation Radius	oParts of Line
oLoading Factors	oCalculating Capacities
oEffective Weight	oBoom Assembly and Tear Down
oStability	oBoom Repair
oLoad Movements	oRopes and Reeving
oLeverage	oSet-up/Daily Inspections
oRate of Tip	oMeasuring Effective Radius
oFailures	oLeveling Techniques
oGantries/Live/High Mast	oSwing Out
oCounter Weights/Cantilever	oSlack on Drums
oBoom Angles	oPick and Carry Techniques
oJibs/Extensions	oLifting on Tires
oSelecting the Right Crane	oPersonnel Protection
oProduction Lifts	oOperating Around High Voltage
oQuadrants of Operation	oHitting Booms
oWeight Determination	oTwo Blocking
oTest Lifts	oRaising/Tipping Slabs
oConditions Affecting Capacity	oCold Weather Operation
oOutriggers	oBoom Over Backwards - Tipping
oMultiple Crane Lifts	oUnattended Rigs
oOverload Hazards	oResponsibilities
oLoad Charts	oSignals
Maximum Crane Capacity Qualified to Ope	erate
Last Project Worked on	
Type of Lifts Performed	
Union/Company F	Representative (print)Phone Number
Union/Compa	any Representative (sign) Date

NOTE: An Operator Verification must be presented by the Operator at time of hire as a Crane Operator. Completion of Operators Verification by the Operating Engineers affected local verifies Operators training. This does not establish or assume any liability for the project.

1 of 1

FDF KNOWN CONFINED SPACE LOCATIONS

CONTACT FDF SAFETY FOR ADDITIONAL INFORMATION OR ANY QUESTIONS

Grid Number	Outside/ Inside	Location	Name of Type of Space	Reference Number
3	0	ALONG E STREET ON EAST SIDE OF FENCE BETWEEN 77 & 78	TELEPHON E MANHOLE	434
4	0	WEST OF BLDG. 79 IN GRAVEL ON EAST SIDE OF STREET	SEWER MANHOLE	150
4		WEST OF BLDG 79 IN GRAVEL ON EAST SIDE OF STREET	SEWER MANHOLE	151
3	0	EAST STREET ON EAST SIDE OF FENCE BETWEEN BLDG 77 AND 78	ELECTRICA L MANHOLE	226
2	0	SOUTH WEST OF NEW DECONTAMINATION BUILDING	ELECTRICA L MANHOLE	227
2	0	SOUTHWEST OF NEW DECONTAMINATION	TELEPHON E MANHOLE	435

Note: All confined spaces associated with the Leachate System and Lift station are not reflected on this list. They are still being constructed at this time and should be noted on project drawings. All below grade components, such as manholes, clean outs and lift station should be considered a confined space.

REQUIREMENTS FOR PHYSIOLOGICAL MONITORING

STAY TIMES

Pulse rate and Temperature shall be used to determine the stay time. In addition, worker temperature can be used in combination with pulse rate to determine stay times. Initially the frequency of physiological monitoring depends on the clothing in use, the environmental temperature (Wet Bulb Globe Temperature (WBGT) or adjusted temperature for impermeable ensemble) and the level of physical work (see Table 8-1). The length of the work cycle will be governed by the frequency of the required physiological monitoring.

The length of the rest period will be a minimum of 15 minutes following removal of PPE. Fluor Daniel Fernald Medical may make exceptions to the Physiological Monitoring requirements which are described below.

1. PULSE RATE (required):

If the initial pulse rate exceeds 100 beats per minute (bpm) before the start of the work activity contact Medical before the start of work; and

If the pulse rate exceeds 110 bpm at the beginning of the rest cycle, shorten the next work cycle by one-third and keep the rest period the same. If the pulse rate still exceeds 110 bpm at the beginning of the next rest period shorten the next work cycle by one-third (Continue shortening the work cycles by one-third if subsequent pulse rates exceed 110 bpm).

NOTE: If the pulse rate exceeds 150 bpm at the beginning of the rest cycle extend the length of the rest period until the pulse rate reaches 110 bpm. Do not allow a worker to wear impermeable or semipermeable ensemble if rate exceeds 150 bpm.

2. TEMPERATURE - ORAL OR TYMPANIC (EAR): (optional)

If the worker's initial temperature exceeds 99.6°F before the start of the work activity contact Medical prior to the start of work; and

If the worker's temperature exceeds 99.6°F at the beginning of the rest cycle, shorten the next work cycle by one-third without changing the rest period. If the worker's temperature still exceeds 99.6°F at the beginning of the next rest period shorten the next work cycle by one-third (Continue shortening the work cycles by one-third if subsequent temperatures exceed 99.6°F).

NOTE: If the worker's temperature exceeds 100.4°F extend the length of the rest period until the temperature reaches 99.6°F. Do not allow a worker to wear impermeable or semi-impermeable anti-C's when temperature exceeds 100.4°F.

3. FLUID LOSS (Optional)

In addition to pulse rate and/or temperature monitoring of workers for stay time, weight change monitoring is also useful to check fluid loss from the body. Weight should be measured at the start of the work shift and at the end of the work shift. Body water loss should not exceed 1.5% of total body weight in a workday. Contact Medical if a weight loss of 5 pounds or more occurs.

Table 8-1

A. Physiological Monitoring With	Normal Work Clothin	g						
	Frequency of	f Physiological Monito	oring (minutes)					
Environmental Temperature		Work Load						
(F , WBGT) ⁽¹⁾	Light	Moderate	Heavy					
78-81	(2)	(2)	90					
82-86	(2)	90	60					
87-90	90	60	45					
>90	60	45	30					
B. Physiological Monitoring With	Semi-impermeable W	ork Clothing						
Frequency of Physiological Monitoring (minutes)								
Environmental Temperature		Work Load						
(F , WBGT) ⁽¹⁾	Light	Moderate	Heavy					
68-71	(2)	(2)	135					
72-76	(2)	135	105					
77-81	135	105	75					
82-86	105	75	45					
87-90	75	45	30					
>90	45	30	15					
C. Physiological Monitoring With	Impermeable Work C	lothing						
	Frequency of	f Physiological Monito	oring (minutes)					
Environmental Temperature		Work Load						
(F , WBGT) ⁽¹⁾	Light	Moderate	Heavy					
61-67	(2)	(2)	90					
68-76	150	120	60					
77-81	120	90	30					
82-86	90	60	15					
87-90	60	30	(3)					
>90	30	15	(3)					

Environmental temperatures will be determined as WBGT, except for work in impermeable anti C's which use adjusted temperature. Calculate the adjusted temperature (a adj. F) as:[a adj. F = shielded dry bulb temp F + (13 X % sunshine): where 100% sunshine = no cloud and a sharp, distinct shadow: 0% sunshine = no shadows). Not Required. Contact Medical (fluid loss monitoring will also be required)

MODEL SUBSTANCE ABUSE PROGRAM

1.0 POLICY

It is the policy of _____ that on contracts at Fernald Environmental Management Project (FEMP) including offsite locations, a DOE owned or controlled site:

The use, possession, sale, distribution, or manufacture of illegal drugs or alcohol at work or while on DOE property is prohibited.

Reporting to work while under the influence of intoxicants (including alcohol), narcotics, hallucinogens, depressants, stimulants, or other such drugs is also prohibited.

Any employee who violates this policy shall be subject to disciplinary action up to and including termination.

Any employee working at a DOE owned or controlled site shall receive notification that as a condition of employment under the contract the employee will abide by this policy.

2.0 EMPLOYEE EDUCATION AND TRAINING

Education and training programs will be presented to all employees which instruct the employee on the health aspect of substance abuse, safety, security and other workplace-related problems caused by substance abuse, provisions of DOE 10 CFR Part 707, and the employer's policy.

Managers and supervisors will receive additional training in the recognition of deteriorating job performance or judgement, or observation of unusual conduct which may be the result of possible illegal drug use, their responsibility to intervene, and the employer's policy.

3.0 EMPLOYEE ASSISTANCE

Employee assistance programs emphasizing preventative services, education, short term counseling, coordination and referral to outside agencies, and follow up shall be available to all on-site employees involved in the contract.

4.0 NOTIFICATION REQUIREMENTS

Any employee convicted under criminal drug statute for a violation occurring on a DOE and/or controlled site must notify Fluor Daniel Fernald in writing within 10 days after such conviction. Failure to notify Fluor Daniel Fernald of such a conviction is grounds for disciplinary action up to and including discharge. Within 10 days of receiving such notice Fluor Daniel Fernald will notify DOE of the conviction.

Within 30 days of receiving such a notice, appropriate personnel action must be taken against such an employee up to and including termination, or the employee, consistent with Fluor Daniel Fernald's policy, may be offered the opportunity to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by Federal, State, or local health, law enforcement, or other appropriate agency.

EXHIBIT "9"

If the employee does not participate in such a rehabilitation program, the contractor must take appropriate personnel action, up to and including termination, in accordance with Fluor Daniel Fernald's policies.

5.0 <u>TESTING DESIGNATED POSITIONS</u>

Personnel determined by Fluor Daniel Fernald to be in a Testing Designated Positions are subject to random drug testing. Testing Designated Positions are positions directly engaged in production, use, storage, transportation, or disposal of hazardous material sufficient to cause significant harm to the environment or to public health and safety.

6.0	CERTIFICATION
	is committed to providing a safe workplace that is free from substance abuse by equiring that all employees be free of substance abuse of alcohol or drugs, while performing work at a DOE owned or operated facilities.
	Name and signature of authorized person:
	(Print)
	(Title)
	(Signature)
	(Date)



(This form to be completed by Contractor and submitted to CCM)

	CONTRAC	TOR'S	S TEN	ΓΑΤΙ	VE PERSONNE	L LIS	Γ
Projec	xt:						
Projec	t Location:						
•	et Manager:				Project start		_
		gor:			Schodulad Comp	lotion Dat	to:
					Scheduled Comp		
					Project H&S Off	icer:	
Contra	actor (prime):						
Today	's Date:	Comple	eted by:				
CONS	TRUCTION CRAFT, INC	LUDING F	OREMEN		CONSTRUCTION CONT	RACTOR	STAFF
Count	Craft Positions	Job Code	Starting Date	Count	Craft Positions	Job Code	Starting Date
	Asbestos/Instructor Worker	CN01			Plumber	CN11	
	Boilermaker	CN02			Plasterer	CN12	
	Bricklayer	CN03			Roofer	CN13	
	Carpenter	0006			Sheetmetal Worker	CN14	
	Cement Mason	CN04			Sprinkler Fitter	CN15	
	Electrician	0022			Tile Finisher	CN16	
	Floor Layer	CN05			Tile Layer	CN17	
	Glazer	CN06			Administrative	GC08	
	Ironworker (Rebar)	CN07			Office Engineer	EP01	
	Ironworker (Structural)	CN07			Construction Engineer	OP12	
	Lather	CN08			Construction Superintendent	OP12	
	Laborer (Construction)	CN38			Cost/Scheduler/Estimator	AN01	
	Millwright	0050			Engineering Aid/Technician	NE04	
	Operating Engineer (Operator)	CN09			Project/Constructon Manager	EP05	
	Painter	0054			Health & Safety Representative	TA04	
	Pile Driver (Driller)	CN10			Quality Representative	E005	
	Teamster	CN18			Liner Seamer	CN19	



Pipefitter	CN55		Surveyor (Land)	CN20	

Complete the above listing of craft personnel. This list is to reflect the intended manpower and the intended start dat for each craft at N.T.P. This list is to be used as an aid to support departments for planning and scheduling.

Distribution:

bution: Project Safety Officer
Medical Dept. (D. Smith Fax# 648-5753) Training Dept. (T. Roberts Fax# 648-5599)

(This form to be completed by CCM with input from Contractor)

This form to be	completed by C	CCM with input from Contractor)		Project: _		
		TRAININGCONSTRUC	CTION CON	TRACTOR S	TAFF	
All Project Personnel	As Required by Task	Training	All Project Personnel	As Required by Task	Training	
		Site GET Training			Site Energy Control Training (OP-0004)	
		Site Access Training			Confined Space Training for personnel working in permit required confined space.	
		RAD I Training			OSHA Outreach Training for all supervision.	
		Site Worker			Fire Watch Training	
		Supervised Field Experience: 8 Hours (RAD I) or 24 hrs. RAD II)				
		RAD Worker II Training				
		Respirator Training				
		Fit Test				
Completed by:		Date:				

Complete the blocks with the estimated number of personnel for each training requirement listed.

	MEDICAL							
YES	NO	REQUIREMENT	INVOLVED PERSONNEL/CRAFT, IF NOT ALL PERSONNEL					
		Drug Screen (SAP) - Require first						
		Baseline Physical						
		Respirator (required if RAD II)						
		Lead Worker						
		Asbestos Worker						
		Confined Space						



	SCBA	
	Invivo Monitor (Dosimetry Dept.)	
	Other:	

Complete the blocks with the estimated number of personnel.

- 1.0 General
- 1.1 This document defines the requirements for inspecting and operating earth-moving / earth handling equipment and covers equipment such as:
 - A. Dump trucks
 - B. Earth movers
 - C. Front-end loaders
 - D. Bulldozers
 - E. Graders
 - F. Backhoes
 - G. Tracked and rubber-tired hydraulic excavators (e.g., Grade-Alls)
- 1.2 This Procedure applies to both Contractor and FEMP owned or rented equipment.
- 1.3 FEMP Personnel and Employee(s) include <u>anyone</u> performing activities for FEMP.
- 1.4 A Qualified Person is one who meets the specified training and experience criteria.
- 1.5 A Competent Person means one who is capable of identifying existing and predictable hazards with the equipment or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them.

2.0 Requirements

2.1 Notify FDF Safety and Health personnel if any of these requirements cannot be met.

2.2 FDF Safety and Health

- A. Develop and communicate earth moving equipment safety requirements.
- B. Shall inspect the equipment and verify that appropriate inspection &/ or maintenance log documentation is complete for all equipment coming on site, prior to use.

2.3 Equipment Inspections

- A. Provide a copy of the inspection report (annual) to Construction Manager prior to the equipment being allowed access to FEMP.
- B. All inspections shall be documented, maintained with project files and available for review by Fluor Daniel Fernald upon request.
- C. Daily equipment inspection- Inspections shall be done using the attached Operators Checklist, Attachment A, unless alternate form is approved by FDF Safety & Health. Inspections are to be completed by qualified personnel.
- D. All inspections shall ensure that the listed safety devices as required on Attachment B are present and in working condition. The following shall be the minimum frequency of required equipment inspections:
 - 1. <u>Daily</u> Equipment shall be inspected prior to each shift of use by operator of the equipment
 - 2. Quarterly A competent person shall inspect equipment each quarter or more often, if

- directed by the owners manual.
- 3. <u>Annual</u> A complete functional inspection shall be completed by a competent person annually.
- Special Equipment shall be inspected by a competent person following any accident or malfunction.

2.4 Contractor Supervision

- A. Allow only qualified operators and inspect to operate earth-moving equipment.
- B. **Do not** allow the use of equipment until any noted deficiencies are corrected or repaired.
- C. Keep the Owner's/ Operational Manual with the equipment or make it available upon request.
- D. When using continuous-tracked equipment, place protection on paved road surfaces to prevent damage.
- E. Ensure the swing radius of equipment is barricaded (6 feet) from employees during operation or assign dedicated spotter on all continuous-tracked equipment having any portion of the equipment that will swing beyond the outer edge of the continuous track (e.g., counterbalance of a track-hoe).
- F. Ensure that all equipment is equipped with an automatic electronic audible back-up or bidirectional motion alarm that is distinguishable from the surrounding noise level. Maintain alarms in operative condition
 - 1. The alarm sounds when the equipment is moving in the reverse direction or;
 - 2. The alarm sounds in any direction for bidirectional equipment.
 - H. Maintain rollover protection according to (OSHA) 29CFR1926 subpart W. See Attachment B.

2.5 Operators

- A. **Do not** operate equipment without being approved by supervision as a qualified operator.
- B. Inspect equipment daily prior to operating, using the Operators Checklist. See Attachment A. This inspection form aids the operator in ensuring that the equipment is in a safe condition prior to use and documents the inspection.
- C. Operate earth-moving equipment according to the posted safe speed limit.
- D. Ensure that equipment operated on public roadways meets the requirement of the local governing body.
- E. Earth-moving equipment may carry only as many people as there are factory-installed seats and seat belts. All occupants are required to use seat belts when vehicles are in operation.
- F. During refueling of equipment:
- 1. Shut off and cool down the engine.
- Have a fire extinguisher present.

- 3. When required, utilize proper electrical grounding/bonding techniques.
- G. Ensure earth-moving equipment operated after dark and/or under limited lighting is equipped with factory-installed lighting or equivalent lighting subject to the Qualified Person's approval.
- H. Remove materials classified as flammable and explosive manually before using earth-moving equipment in any operating area.
- I. **Do not** allow personnel to occupy excavators or loader buckets during the operation of the equipment.
- J. If failure of a hydraulic system occurs, clean up the spill according to FEMP, local, State, and Federal regulations. Ensure that the FDF AEDO is contacted through the FDF Construction Manager for any spill reporting.

K. Backhoes / Excavators:

- 1. Avoid "walking" and/or straddling a backhoe across an open trench.
- 2. If walking or straddling is necessary, follow approved safe work plans.
- 3. **Do not** use backhoes for any operations exceeding the manufacturer's recommendations or the capability of the equipment (e.g., unloading a truck with a backhoe boom instead of a crane).
- 4. If the manufacturer permits the use of a backhoe as a "crane," ensure that:
 - a. All hoisting & rigging operations shall be performed according to the Hoisting & Rigging Manual (RM-0045, chapter 15)
 - b. Load charts showing load and radius capacities are in the backhoe.
 - c. FDF lift plan is required prior to moving any loads

L. Trucks with Dumping Beds:

- 1. If the cab of a dump truck is equipped with vertical and horizontal protection (designed to withstand the impact of the material being loaded), all personnel may remain in the cab of the dump truck during the loading of the dump bed with materials less than 3 inches in diameter.
- 2. During the loading of material greater than 3 inches in diameter, all personnel must:
 - a. Leave the truck.
 - b. Wear all required site-specific safety equipment (e.g., hard hats and safety glasses) when they are outside the vehicle.
- 3. **Do not** transport personnel in the bed of any dump truck.
- 4. When dumping a load, follow the manufacturer's recommendation on stable ground condition requirements.

Note: These recommendations give the "acceptable" slope of the terrain when operating the dump

bed.

- 6. Prior to dumping loads on the elevated edges of "new fill" areas, erect a warning barricade or use a designated person as a ground guide to prevent the dump truck from entering the area of unstable material.
- 7. Before operating a dump truck with the bed in the "up" position, verify and check for overhead clearances before and during forward and backward movements.
- 8. Use a positive bed lock when any work is required under the dumping bed when the bed is an "up" position.

M Spotter Personnel

The use of a spotter is required when:

The equipment operator's vision is obstructed in the direction the equipment is moving. (Note: The operator's vision may be obstructed by the design of the equipment (track hoes, dump truck) or by movement of a load (fork truck, lifting with a boom of track hoe).

The equipment is operated in a tight configuration. (Note: Tight configurations are considered areas where clearance between the equipment and an obstruction (telephone or de-energized overhead lines, buildings) is less than 3 feet.)

3.0 Attachments

Attachment A - EARTH MOVING EQUIPMENT - OPERATORS CHECKLIST
Attachment B - SAFETY DEVICES REQUIRED FOR THE EARTH MOVING EQUIPMENT

4.0 References

29 CFR 1926.600 and .604 29 CFR 1926.1001

Attachment A

EARTH MOVING EQUIPMENT - OPERATOR'S CHECKLIST

EQUIPMENT (NUMBER OR TYPE):

HOUR METER:			SPEEDOMETER:	SPEEDOMETER:			JOB or PROJECT:			
OK	OK N/A NEEDS REPAI R		ITEMS	ОК	N/A	NEEDS REPAI R	ITEMS			
			Engine Oil level				backup or motion alarm			
			Radiator water level when cool				Windshield wiper			
			Fuel Level				Air leaks			
			Tire condition				Other warning equipment or signs			
			Obvious leaks or damage				Fire Extinguisher			
			Headlights & taillights				Housekeeping			
			warning lights				Operational controls marked			
			Gauges & instruments				Seat Belts of all seat positions			
			turn signals				Windshield & other glass			
			Steering				Hydraulic leaks			
			Horn				hydraulic controls			
			Parking brake							
			Service brakes							
	NOTE: Ite	ems needing	repair are to be corrected or approved by	by the compet	ent persor	n before use	of equipment			
DATE:			Unit is due for next service / maintenance on this date:				Unit/equipment is safe to operate			
_										
OPERATOR:			SUPERV	SUPERVISOR:						

Attachment B

Safety Devices Required For Earth Moving Equipment

Equipment Categories	5 BC Rating Fire Ext.	Horn	Reverse/ motion Alarm	ROPS**	Seat Belt	Overhead Protection	Other
Excavator Crawler	X	X					
Excavator Truck MTD	X	X	X		Carrier		
Dump Truck	X	X	X				
FIL - Backhoe	X	X	X	X	X		
Motor Grader	X	X	X	X	X		
Motor Scraper	X	X	X	X	X		
Skid Loader	X	X	X	X	X	X	
Trencher	X	X	X	X	X		
Wheel Loader	X		X	X	X		
Truck Tractor	X	X	X		X		
Tandem Dump	X	X	X		X		Dump Body Support - Cab Shield

^{**} Rollover protective structures (ROPS) will be required for all equipment as defined in OSHA 29 CFR 1926 subpart W. No exception will be permitted for date of manufacture of the equipment.

FERNALD SITE EQUIPMENT OPERATOR VERIFICATION

(HEAVY EQUIPMENT/ EARTH MOVING EQUIPMENT)

Th	This Document defines the requirements for training, qualific	cation, and/or certification of equipment operato	rs							
at	I verify that of Local _ at the Fernald Environmental Management Project (FEMP), of and that this tr		to: ior							
0	o Preparatory training:									
	 Machine terminology Safe operating procedures Pre-operational and post-operational maintenance of 	checks								
О	o Basic operating principles:									
	 Machine controls and functions Machine components and attachments Operation and function of components and attachments 	nents								
О	o Review the following:	Review the following:								
	 Manufacturer's operator manual Occupational Safety and Health Act (OSHA) Regula American National Standards Institute (ANSI B30.5) 	2. Occupational Safety and Health Act (OSHA) Regulations								
0	o Documented examination for each piece of equipment.									
0	o Pratical demonstration by an experienced operator.									
0	o Documented examination on maneuvering for each piece	ce of equipment or category.								
О	o On-the-Job (Field) Performance Evaluation.									
Ur	Union/Company Representative (print)	Phone Number								
 Ur	Union/Company Representative (sign)	 Date								

NOTE: An Operator Verification must be presented by the Operator at time of hire. Completion of Operators Verification by the Operating Engineers affected local verifies Operators training. This does not establish or assume any liability for the project.

CONSTRUCTION AREA

AUTHORIZED PERSONNEL ONLY

PROJECT NAME HERE

ENTRY IS ONLY PERMITTED AT DEFINED ENTRANCE POINTS

YOU MUST HAVE BEEN BRIEFED ON THE PROJECT SPECIFIC HEALTH & SAFETY REQUIREMENTS OF THIS PROJECT AND BE APPROVED BY CONSTRUCTION MANAGEMENT PRIOR TO ENTRY TO THIS CONSTRUCTION AREA

CONTACT <u>JOE SMITH AT PHONE 123-4567</u> OR BY CONSTRUCTION RADIO <u>#XX ON</u> CHANNEL #X TO OBTAIN PERMISSION FOR ENTRY

IDENTIFIED SAFETY OF HOUSEKEEPING ISSUES ASSOCIATED WITH THIS AREA SHOULD BE DIRECTED TO JOHN DOE AT PHONE 123-4567

The above sign shall be required at all entry points (gates) and along the construction perimeter fence line at or about xxx foot spacing.

sign specs: black border black lettering yellow background

top half of sign shaded area to be black lettering to be yellow